

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:
LOCAL TV ADVERTISING ANTITRUST
LITIGATION

MDL No. 2867
No. 18 C 6785

Honorable Virginia M. Kendall

DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL
THEIR MOTION TO RECONSIDER

Defendants Griffin Communications, LLC (“Griffin”), Meredith Corporation (“Meredith”), Nexstar Media Group, Inc. (“Nexstar”), Gray Media Group, Inc. (formerly known as Raycom Media, Inc.) (“Raycom”), the E.W. Scripps Company (“Scripps”), Sinclair Broadcast Group, Inc. (“Sinclair”), and TEGNA, Inc. (“TEGNA”) (collectively “Defendants” or “Non-Settling Defendants”), by their attorneys, respectfully ask the Court for entry of an Order granting Defendants leave to file their Motion to Reconsider, Vacate, And/Or Stay Orders Regarding Preliminary Approval and Notice (“Motion to Reconsider”) under seal, pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 26.2. (“Defendants’ Motion to Seal”).

In support thereof, Defendants state as follows:

1. On February 15, 2019, the Court entered a Confidentiality Order. (ECF No. 194). The Confidentiality Order permits parties to designate certain produced information as “CONFIDENTIAL” or “CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” (*Id.* at 2–3).

2. As the Seventh Circuit has recognized, a court may keep documents or portions thereof under seal if “there is good cause for sealing a part or the whole of the record.” [Citizens First Nat’l Bank of Princeton v. Cincinnati Ins. Co.](#), 178 F.3d 943, 945 (7th Cir. 1999); see also [N.D. Ill. L.R.](#)

[26.2\(b\)](#) (explaining “good cause” standard). Accordingly, the Court may seal filings to protect the “property and privacy interests of the litigants,” [Citizens First Nat’l Bank, 178 F.3d at 945](#), where the information in question “meet[s] the definition of trade secrets or other categories of bona fide long-term confidentiality,” [Baxter Intern., Inc. v. Abbott Lab’ys., 297 F.3d 544, 545 \(7th Cir. 2002\)](#).

3. Good cause exists to grant Defendants’ Motion to Seal because the Motion to Reconsider references material designated as “CONFIDENTIAL” or “CONFIDENTIAL – ATTORNEYS’ EYES ONLY” material under the Confidentiality Order.

4. In compliance with Local Rule 26.2(c), Defendants will also file a public-record version of the Motion to Reconsider that redacts all references to materials currently designated confidential pursuant to the Confidentiality Order.

WHEREFORE, Defendants respectfully request that the Court grant their Motion to Seal.

Dated: June 28, 2023

By: /s/ Ross B. Bricker

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 28, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will provide notice to all counsel of record.

/s/ Ross B. Bricker

Ross B. Bricker